

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

LUCKY BUCKS HOLDINGS LLC,

Debtor.

MARC ABRAMS,

In his capacity as Chapter 7 Trustee of Lucky
Bucks Holdings LLC and as assignee,

Plaintiff,

v.

TRIVE CAPITAL MANAGEMENT LLC,
et al.,

Defendants.

Chapter 7

No. 23-10756 (KBO)

Adversary Proceeding

No. 24-ap-50130 (KBO)

TRIVE DEFENDANTS' MOTION TO COMPEL

Pursuant to Federal Rule of Civil Procedure 37, made applicable to this adversary proceeding by Federal Rule of Bankruptcy Procedure 7037, Defendants Trive Capital Management LLC, Trive Capital Fund III LP, Trive Capital Fund III-A LP, TCFIII Luck LP, TCFIII Luck SPV LP, TCFIII Luck Acquisition LLC, Southern Star Gaming, LLC, and Shravan Thadani (collectively, the “Trive Defendants”), by and through their undersigned attorneys, hereby respectfully move this Court for entry of an order (the “Motion”), substantially in the form attached hereto as Exhibit A, compelling the Plaintiff, Marc Abrams, in his capacities as Chapter 7 Trustee of Lucky Bucks Holdings LLC and as assignee, to produce the documents described in the *Memorandum of Law in Support of Trive Defendants’ Motion to Compel* (the “Memorandum of Law”). In support of this Motion, the Trive Defendants have contemporaneously filed, and incorporate herein by reference, the Memorandum of Law, and the *Declaration of Ross E.*

Firsenbaum in Support of Trive Defendants' Motion to Compel (the "Firsenbaum Declaration") and the exhibits thereto.

WHEREFORE, for all the reasons set forth herein and in the accompanying Memorandum of Law, the Trive Defendants respectfully request that the Court enter an order, substantially in the form attached hereto, (a) granting the Motion, (b) compelling the production of the documents specified in the Memorandum of Law and Proposed Order, and (c) granting such other and further relief as the Court deems just and appropriate.

Dated: August 12, 2025
Wilmington, Delaware

Respectfully submitted,

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